



March 15, 2023

Ms. Cheryl Laskowski, Branch Chief
Low Carbon Fuel Standard
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Comments on the February 22, 2023, LCFS Public Workshop – Potential Regulation Amendment Concepts

Dear Ms. Laskowski:

The National Corn Growers Association (NCGA) values the opportunity to provide comments on the February 22, 2023, Low Carbon Fuels Standard (LCFS) Program Workshop on Potential Regulation Amendment Concepts. NCGA represents 40,000 dues-paying corn growers and more than 300,000 farmers who contribute to corn promotion programs nationally. Along with its 49 affiliated state organizations, NCGA works to protect and advance the interests of corn growers. NCGA recognizes CARB staff's leadership in continuing to refine the LCFS program to support California's ambitious climate goals and serve as an example to encourage similar programs elsewhere.

While NCGA is encouraged that ongoing efforts by CARB include greater carbon intensity reductions, we also urge the consideration of all solutions to help reach these reductions. An expeditious path to help achieve a 30 percent or greater reduction in carbon intensity by 2030 will include the use of fuel blends of up to 15 percent ethanol (E15) in California. We are pleased that the CATS model can help illustrate the importance of E15 to meeting the state's climate goals. Increasing ethanol blends to E15 will provide immediate carbon intensity reductions, including reductions from the millions of light duty vehicles currently on the road in the state, to help achieve the more aggressive goals.

NCGA encourages CARB to move its current Multimedia Evaluation (MME) of E15 forward swiftly. E15 will provide multiple benefits including reducing air pollution and carbon emissions as well as fuel costs. E15 has been readily available in nearly all other states for more than a decade, and higher ethanol blends have long been used successfully both nationally and internationally.¹ The adoption of E15 will lower criteria and toxic pollutant emissions from

¹ Renewable Fuels Association and Growth Energy, "California Multimedia Evaluation of E11-E15 Gasoline-Ethanol Blends Tier I Report," June 2020. <https://ww2.arb.ca.gov/resources/documents/fuels-multimedia-evaluation-e15>.

WWW.NCGA.COM

NATIONAL OFFICE
632 Cepi Drive
Chesterfield, MO 63005
(636) 733-9004

WASHINGTON, DC OFFICE
20 F Street NW, Suite 900
Washington, DC 20001
(202) 628-7001

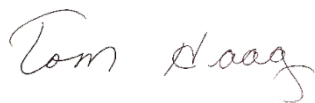
vehicles and refineries while reducing dependence on petroleum. E15 is an on-hand, affordable solution for existing vehicles to quickly reduce carbon emissions.

According to the Tier I Report prepared by the Renewable Fuels Association and Growth Energy for the MME, results show the use of E15 compared to E10 will result in significant air quality improvements from lower tailpipe emissions.² Because ethanol is nearly 50 percent lower in carbon intensity than unblended gasoline, blending additional ethanol lowers fuel's carbon intensity, making it clear that carbon intensity reductions can be aided through the timely adoption of E15 in California.

Additionally, the 2022 final report on vehicle testing conducted by UC Riverside for the MME found: 1) Statistically significant reductions of particulate matter and aromatics emissions in vehicles using E15 compared to standard E10; 2) Ozone forming potential trended lower for E15 compared to E10; and 3) Use of E15 in California will likely reduce air toxics from current vehicles and will not lead to air quality degradation in California.³

NCGA strongly urges CARB to complete the MME process for E15 so the state can take advantage of E15 as an accessible near-term solution to reach decarbonization goals. We thank CARB for its ongoing efforts in updating the LCFS program and engaging stakeholders in the rulemaking process. We look forward to additional opportunities to provide feedback and support.

Sincerely,

A handwritten signature in cursive script that reads "Tom Haag".

Tom Haag, President
National Corn Growers Association

² "California Multimedia Evaluation of E11-E15 Gasoline-Ethanol Blends Tier I Report."

³ Karavalakis, Georgios, Thomas Durbin, and Tianbo Tang. "Comparison of Exhaust Emissions Between E10 CaRFG and Splash Blended E15," June 2022. <https://ww2.arb.ca.gov/resources/documents/comparison-exhaust-emissions-between-e10-carfg-and-splash-blended-e15>.